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December 8, 2020

## VIA ECF

Hon. Douglas E. Arpert, U.S.M.J.  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

Re: *IFMK Realty II, LLC v. Atlantic Property Development, LLC, et al.*  
Civil Action No. 3:20-cv-6989-MAS-DEA

Dear Judge Arpert:

We represent Plaintiff IFMK Realty II, LLC (“IFMK”) in the above-referenced action. As discussed with Your Honor during the parties’ telephonic status conference on December 7, 2020, IFMK respectfully requests a modest extension of the current deadlines for amending pleadings and completing fact discovery, as set forth in the table below. Defendant Felix Nihamin does not oppose this request.

Event	Current Deadline	Proposed Deadline
Deadline to Move to Amend Pleadings or Add New Parties	December 15, 2020	January 29, 2021
End of Fact Discovery	February 10, 2021	March 31, 2021

If these deadline extensions are acceptable, we respectfully request that Your Honor So Order this letter and enter it on the docket.

We thank the Court for its attention to this matter, and we are available if Your Honor or Your Honor’s staff have any questions or need anything further.

Respectfully submitted,

/s/ *Karl Geercken*

Karl Geercken

cc: All Counsel of Record (via ECF)

Alston & Bird LLP

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